

August 15, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Notice of Ex Parte – Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

Dear Ms. Dortch:

On August 11, 2016, Bob Rae, President and CEO, Purple Communications, Inc. (Purple) (by telephone); John Goodman, Chief Legal Officer, Purple; Michael Strecker, Vice President of Regulatory Affairs, Purple; and Paul Besozzi, Squire Patton Boggs (US) LLP, counsel to Purple, met with Nick Degani, Legal Advisor, Office of Commissioner Pai.

In the meeting, Purple discussed current competitive conditions in the VRS market, including the continued and potential impact of implementing dramatic VRS rate cuts on providers' viability and ability to compete effectively for market share. Although the *2013 VRS Reform Order* set forth reforms intended to enable competitive providers to grow market share and reduce costs concurrently with the declining rates, those structural reforms have yet to be realized in the market even as rates have dropped.¹ Therefore, the need for VRS rate structure reform that will help stabilize the marketplace and the potential components of such reform were discussed.

Purple also discussed its views on various VRS-related service issues, including skills based routing, at home interpreting, implementation of Accessible Communications For Everyone ("ACE"), and the importance of effective interoperability standards that are adhered to by market participants or enforced by the Commission.

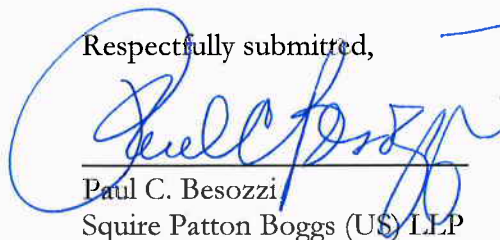
¹ *Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 & 03-123, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-82, ¶¶ 19-86 (June 10, 2013) (*2013 VRS Reform Order*).

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Respectfully submitted,



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cc: Nicholas Degani